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7 *Attorneys for Defendant, TSC ACCOUNTS*  
8 *RECEIVABLE SOLUTIONS*

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 Valerie McKinney,

12 Plaintiff,

13 Vs.

14 Experian Information Solutions, Inc., TSC  
15 Accounts Receivable Solutions; and  
16 Backgroundchecks.Com, LLC,

17 Defendants.

Case No. 2:22-CV-01354-GMN-VCF

**STIPULATION TO EXTEND TIME TO  
RESPOND TO COMPLAINT**

**[SECOND REQUEST]**

18 Plaintiff VALERIA McKINNEY (“Plaintiff”) and Defendant TSC ACCOUNTS  
19 RECEIVABLE SOLUTIONS (“Defendant”), through their respective counsel of record, hereby  
20 stipulate to extend the time by which Defendant shall respond to Plaintiff’s Complaint.

21 **STIPULATION**

22 WHEREAS, Plaintiff filed this action on August 23, 2022;

23 WHEREAS, Defendant requested and Plaintiff granted an extension until October 10<sup>th</sup>,  
24 2022, for Defendant to respond to the Complaint;

25 NOW, THEREFORE, Plaintiff and Defendant hereby stipulate to an extension of time to  
26 October 14<sup>th</sup>, 2022, for Defendant to respond to Plaintiff’s Complaint.

27 This extension of time does not operate as any admission against interest by Plaintiff  
28 concerning the Complaint [ECF No. 1], nor as a waiver of any defense that Defendant may have  
with regard to the Complaint [ECF No. 1], to the Court’s jurisdiction over this matter, to the venue

1 of this matter, or to service and service of process.

2 This is the second request for an extension. It is not intended for an improper purpose or to  
3 cause delay, but is made in good faith after discussions between the counsel of record due to current  
4 calendar conflicts and of defense counsel.

5  
6 DATED this 10<sup>th</sup> day of October, 2022.

7 **KIND LAW**

8 /s/ Geraldo Avalos

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21 *Counsel for Plaintiff, VALERIE MCKINNEY*

DATED this 10<sup>th</sup> day of October, 2022.

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

/s/ Marc S. Cwik

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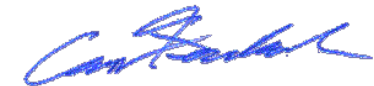
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*Attorneys for Defendant, TSC ACCOUNTS*

*RECEIVABLE SOLUTIONS*

22 IT IS SO ORDERED.

23 

24 Cam Ferenbach

25 United States Magistrate Judge

26 10-11-2022

27 DATED \_\_\_\_\_